D. G. SWEIGERT, C/O, MAILBOX, PMB 13339 514 Americas Way, Box Elder, SD 57719 Spoliation-notice@mailbox.org

March 12, 2025

Sweigert v. Goodman, 23-cv-05875-JGK

U.S. Magistrate Judge Honorable Valerie Figueredo U.S. District Court for the Southern District of New York 500 Pearl Street New York, N.Y. 10007 Via ECF filing

SUBJ: Status Conference April 1, 2025, Request to Deem Facts Admitted prior to 4/1/2025 Dear Judge Figueredo,

- 1. Pursuant to Federal Rule of Civil Procedure (F.R.C.P.) 36 this is a letter motion to deem matters admitted and requests the court to consider facts as established as the Defendant has failed to respond to the attached Requests for Admissions (RFA).
- 2. The attached RFA was served upon Defendant Goodman on December 25th, 2024. Service was sworn under penalties of perjury.
- 3. To this date, after reminders via e-mail message and docketed notifications of his tardiness, Mr. Goodman has not responded to the RFA attachment.
- 4. Therefore, the Plaintiff requests this court grant the RFA facts as admitted, as described in the attached.

Respectfully, Signed 03/12/2025

D. Jat

D. G. SWEIGERT PRO SE PLAINTIFF

CERTIFICATE OF SERVICE

Hereby certified under penalties of perjury that a true copy of this pleading has been e-mailed to YouTuber Jason Goodman at jason@21stcentury3d.com and <a h

Respectfully, Signed this 03/12/2025

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UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

D. G. Sweigert,	
Plaintiff	PRO SE
Versus	23-cv-5875-JGK
Jason Goodman,	John G. Koeltl, presiding
Defendants	RULE 36 REQUEST TO ADMIT

REQUEST TO ADMIT

- 1. There is no evidence that George H. Sweigert (plaintiff's father) benefited in any manner, or in any way, from something known as "NAZI OPERATION PAPERCLIP".
- 2. There is no evidence that plaintiff's father entered the Republic of Germany at any time in his life.
- 3. There is no evidence that plaintiff's father was anything other than a Staff Segreant in the 37th Division, assigned to the 145th Headquarters Company during the hostilities and combat operations known as Word War II.
- 4. There is no evidence that plaintiff's father ever contributed any benefit, whatsoever, to the political state known as the Third Reich or the political party known as "NAZI".

- 5. There is no evidence that plaintiff's father contributed any technical information, whatsoever, to any forces opposing the United States in World War II, to include the Axis Powers.
- 6. There is no evidence that plaintiff's father was assisted in citizenship, employment or other social introductions by the U.S. Army following his discharge from active service July 5th, 1945
- 7. There is no evidence that plaintiff's father ever left the confines of the United States, in any manner, whatsoever, to participant in any overseas travel prior to his participation in World War II.
- 8. There is no evidence that plaintiff's first ex-wife, that resides in Florida, ever met George W. Sweigert (George Webb) other than at the wedding of George Webb in Portland, Oregon in the mid-1980s.
- 9. There is no evidence that plaintiff's first ex-wife, that resides in Florida, ever had an intimate moment alone with George Webb that could allow for a sexual encounter since the wedding in Portland, Oregon.
- 10. There is no evidence that plaintiff's first ex-wife, that resides in Florida, met George Webb in any manner since the wedding in the mid-1980s.
- 11. There is no evidence that plaintiff's first ex-wife, that resides in Florida, ever had oral sex, or sex of any kind, or any intimate contact of any kind with George Webb.

- 12. There is no evidence that plaintiff's first ex-wife, that resides in Florida, is promiscuous in any manner whatsoever.
- 13. There is no evidence that plaintiff's first ex-wife, that resides in Florida, has ever spoken to George Webb, to include telephonic conversation, at any time, whatsoever, except for the wedding in Portland, Oregon.
- 14. There is no evidence that plaintiff's first ex-wife, that resides in Florida, ever was a party to a wife swapping arrangement with her ex-husband or George Webb.
- 15. There is no evidence that Jason Goodman has any professional credentials limited to news reporting, journalism, investigative journalism or any such endeavor.
- 16. There is no evidence that Jason Goodman has ever attended any courses, seminars or training related to journalism, evidence collection or news reporting.
- 17. There is no evidence that Jason Goodman's "Twitter Coup" contains serious reporting concerning the alleged conspiracy between Judge Valerie Caproni, Adam Sharp or the plaintiff.
- 18. There is no evidence that Jason Goodman's "Twitter Coup" has ever been taken seriously by any news reporting agency, news program or legislative body.
- 19. There is no evidence that indicates Jason Goodman conducts research of evidence to compile new reports for the purpose of journalism.

- 20. There is evidence that Jason Goodman displays personality traits of someone that is easily angered by persons on the sidewalk that causes Mr. Goodman to launch into rage filled profanities.
- 21. There is evidence that Jason Goodman has captured himself on video on 27 occasions screaming at bystanders in so-called profanity filled yelling matches.
- 22. There is no evidence that the plaintiff has directed a "mass reporting" campaign at Mr. Goodman regarding his social media accounts.
- 23. There is no evidence that indicates that Jason Goodman has any business relationship with any paywall Internet provider such as PATREON, ODYSEE, SubscribeStar other than that of a normal garden variety subscriber to a service.
- 24. There is no evidence that indicates that Jason Goodman understands the history of World War II and the operation of military forces in Europe and the South Pacific.
- 25. There is no evidence that Jason Goodman is a member of any professional association, club or group that encourages quality journalism or professional news reporting.
- 26. There is no evidence that indicates that the mother of Jason Goodman was ever harassed by the plaintiff at any time.
- 27. There is no evidence that indicates the plaintiff has an association with a court employee named Richard Loury to fashion a court filing known as "ECF 12".
- 28. There is no evidence to indicate the plaintiff is "mentally ill".

29. There is evidence to indicate that Jason Goodman is mentally ill.

D. Jat

D. G. SWEIGERT, C/O, PMB 13339 514 Americas Way, Box Elder, SD 57719 Spoliation-notice@mailbox.org 12/25/2024

CERTIFICATE OF SERVICE

Hereby certified under penalties of perjury that a true copy of this pleading has been mailed to YouTuber Jason Goodman at 252 7th Avenue, Apt S6, New York, NY 10001.

Respectfully, Signed this December 25, 2024

D. 5つナ D. G. SWEIGERT PRO SE PLAINTIFF, C/O PMB 13339,

514 Americas Way, Box Elder, SD 57719